

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

<b>WALTER SCOTT LAMB,</b>	)	
	)	
<b>Counterclaim</b>	)	
<b>Defendant,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 6:21-cv-55</b>
	)	
<b>LIBERTY UNIVERSITY, INC.,</b>	)	
	)	
<b>Counterclaim</b>	)	
<b>Plaintiff.</b>	)	

**LIBERTY UNIVERSITY, INC.’S  
MOTION FOR SANCTIONS**

Counterclaim Plaintiff Liberty University, Inc. (“Liberty”), by counsel, submits this Motion for Sanctions. For the reasons explained in Liberty’s Memorandum in Support of this Motion, filed contemporaneously herewith, Liberty is entitled to sanctions regarding Walter Scott Lamb’s (“Lamb”) spoliation of evidence and contumacious conduct.

Accordingly, Liberty asks that the Court enter an Order:

- a) Denying Lamb’s Motion for Leave to File a Second Amended Complaint;
- b) Granting Liberty all other relief the Court deems just and proper.

WHEREFORE, for the reasons explained in its accompanying Memorandum, Liberty respectfully requests that this Court grant its Motion for Sanctions.

Dated: May 27, 2022

Respectfully submitted,

LIBERTY UNIVERSITY, INC.  
BY COUNSEL:

/s/ Scott C. Oostdyk  
Scott C. Oostdyk (VSB No. 28512)

Heidi E. Siegmund (VSB No. 89569)  
McGUIREWOODS LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, VA 23219  
(804) 775-1000  
(804) 775-1061 (facsimile)  
soostdyk@mcguirewoods.com  
hsiegmund@mcguirewoods.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of May, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send a true and correct copy to all counsel of record.

/s/

Heidi E. Siegmund (VSB No. 89569)  
MCGUIREWOODS LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, VA 23219  
(804) 775-1000  
(804) 775-1061 (facsimile)  
hsiegmund@mcguirewoods.com

*Counsel for Counterclaim Plaintiff*